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**SHULMAN HODGES & BASTIAN LLP**

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Attorneys for Defendant, Credit Managers Association  
 of California, Inc., dba CMA Business Credit Services,  
 a California non-profit corporation

**UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA**

**SINDICATO DE EMPLEADOS Y  
 TRABAJADORES DE LA INDUSTRIA, EL  
 CAMPO Y EL COMERCIO DEL ESTADO  
 29 C.R.O.M., a Mexican labor union, and  
 SINDICATO NUEVA GENERACION DE  
 TRABAJADORES DE BAJA CALIFORNIA  
 C.R.O.C., a Mexican labor union,**

**Plaintiffs,**

**v.**

**CREDIT MANAGERS ASSOCIATION OF  
 CALIFORNIA, INC., dba CMA BUSINESS  
 CREDIT SERVICES, a California non-  
 profit corporation,**

**Defendants.**

Case No. 07CV2365

**JOINT MOTION RE EXTENSION OF  
 TIME TO FILE AN ANSWER OR  
 OTHER RESPONSIVE PLEADING**

Credit Managers Association of California, Inc., dba CMA Business Credit Services, a  
 California non-profit corporation, (“Defendant”), and Sindicato De Empleados Y Trabajadores De  
 La Industria, El Campo Y El Comercio Del Estado 29 C.R.O.M., a Mexican labor union, and  
 Sindicato Nueva Generacion De Trabajadores De Baja California C.R.O.C., a Mexican labor union  
 (collectively “Plaintiffs”) (collectively “Defendant” and “Plaintiffs” are referred to herein as  
 “Parties”), hereby agree and stipulate as follows:

**WHEREAS**, on December 18, 2007, Plaintiffs filed a complaint for: (1) Breach of  
 Contract; (2) Accounts Stated (Common Count); (3) Goods Sold and Delivered (Common

Count); and (4) Equitable Relief, ("Complaint") against Defendant, commencing Case No. 07CV2365 (the "Action").

**WHEREAS**, Defendant's responsive pleading is due to be filed and served on January 18, 2008.

**WHEREAS**, the Parties agree that additional time is necessary to allow the Plaintiff to seek the necessary authorization to file dismissals to the Complaint, and/or to allow the Parties to further meet and confer regarding the grounds for the answer and responsive pleadings to the Complaint, and/or the joinder of additional parties.

**THEREFORE**, Defendants, by and through its counsel of record, Shulman Hodges & Bastian LLP, and Plaintiffs, by and through its counsel of record, International Practice Group, APC, hereby agree that Defendant shall have up to and including February 1, 2008 to file and serve an answer or other responsive pleading to the Complaint in this Action.

**SHULMAN HODGES & BASTIAN LLP**

Dated: January 18, 2008

By: 

Leonard M. Shulman

Samuel J. Romero

Attorneys for Credit Managers Association of California, Inc., dba CMA Business Credit Services, a California non-profit corporation

**INTERNATIONAL PRACTICE GROUP, APC**

Dated: January \_\_, 2008

By: \_\_\_\_\_

**SEE FACSIMILE**

**SIGNATURE ATTACHED**

Guillermo J. Richman

Joshua J. Richman

Attorneys for Plaintiffs, Sindicato De Empleados Y Trabajadores De La Industria, El Campo Y El Comercio Del Estado 29 C.R.O.M., a Mexican labor union, and Sindicato Nueva Generacion De Trabajadores De Baja California C.R.O.C., a Mexican labor union

1 Count); and (4) Equitable Relief, ("Complaint") against Defendant, commencing Case No.  
2 07CV2365 (the "Action").

3 **WHEREAS**, Defendant's responsive pleading is due to be filed and served on January  
4 18, 2008.

5 **WHEREAS**, the Parties agree that additional time is necessary to allow the Plaintiff to  
6 seek the necessary authorization to file dismissals to the Complaint, and/or to allow the Parties to  
7 further meet and confer regarding the grounds for the answer and responsive pleadings to the  
8 Complaint, and/or the joinder of additional parties.

9 **THEREFORE**, Defendants, by and through its counsel of record, Shulman Hodges &  
10 Bastian LLP, and Plaintiffs, by and through its counsel of record, International Practice Group,  
11 APC, hereby agree that Defendant shall have up to and including February 1, 2008 to file and  
12 serve an answer or other responsive pleading to the Complaint in this Action.

13 **SHULMAN HODGES & BASTIAN LLP**

14 **See Facsimile Signature Attached**

15 Dated: January \_\_, 2008

By: \_\_\_\_\_

Leonard M. Shulman  
Samuel J. Romero  
Attorneys for Credit Managers Association of  
California, Inc., dba CMA Business Credit Services, a  
California non-profit corporation

18 **INTERNATIONAL PRACTICE GROUP, APC**

19 Dated: January 18, 2008

By: \_\_\_\_\_

Guillermo Marrero  
Joshua J. Richman  
Attorneys for Plaintiffs, Sindicato De Empleados Y  
Trabajadores De La Industria, El Campo Y El Comercio  
Del Estado 29 C.R.O.M., a Mexican labor union, and  
Sindicato Nueva Generacion De Trabajadores De Baja  
California C.R.O.C., a Mexican labor union

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the City of Foothill Ranch, County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 26632 Towne Centre Drive, Suite 300, Foothill Ranch, California 92610.

On January 18, 2008, I served the documents named below on the parties in this Action as follows:

DOCUMENT(S) SERVED: **JOINT MOTION AND [PROPOSED] ORDER RE  
EXTENSION OF TIME TO FILE AN ANSWER OR  
OTHER RESPONSIVE PLEADING**

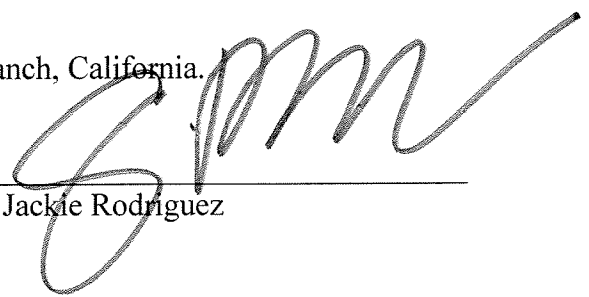
SERVED UPON: **Counsel for SINDICATO DE EMPLEADOS Y  
TRABAJADORES DE LA INDUSTRIA, EL CAMPO Y  
EL COMERCIO DEL ESTADO 29 C.R.O.M., a Mexican  
labor union, and SINDICATO NUEVA GENERACION  
DE TRABAJADORES DE BAJA CALIFORNIA  
C.R.O.C., a Mexican labor union**

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**[X]** (BY MAIL) I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail at Foothill Ranch, California. I am readily familiar with the practice of Shulman Hodges & Bastian LLP for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after deposit for mailing in affidavit.

**[X]** (FEDERAL) I declare that I am employed in the office of a member of the bar of this court, at whose direction this service was made. I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2008, at Foothill Ranch, California.

  
\_\_\_\_\_  
Jackie Rodriguez